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7  
8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 (Hon. Roger T. Benitez)

11  
12 UNITED STATES OF AMERICA, )  
13 ) CRIMINAL CASE NO.: 07-CR-03245-BEN  
14 )  
Plaintiffs, )  
15 )  
v. )  
16 )  
ARMANDO REGALADO NARANJO, et al, )  
17 )  
Defendant. )  
18 )  
19 )  
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CRIMINAL CASE NO.: 07-CR-03245-BEN

**NOTICE OF MOTION FOR JOINDER  
IN CO-DEFENDANTS' MOTIONS AND  
FOR LEAVE TO FILE FURTHER  
MOTIONS**

Date: March 24, 2008  
Time: 2:00pm

20 TO: KAREN HEWITT, UNITED STATES ATTORNEY and  
21 JILL BURKHARDT, ASSISTANT UNITED STATES ATTORNEY

22  
23 NOTICE IS HEREBY GIVEN THAT on the date, time and place indicated above,  
24 Defendant, ARMANDO REGALADO NARANJO (hereinafter "Defendant"), by and through his  
25 attorney of record, Manuel L. Ramirez, Esq. of The Ramirez Law Firm will request to join in the  
26 motion filed by co-defendant Esequiel Lopez ( hereinafter "LOPEZ").  
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2 **MOTION FOR JOINDER**

3 Pursuant to the Fifth and Sixth Amendments to the United States Constitution, Rules  
4 12 and 16 of the Federal Rules of Criminal Procedure, and all other applicable rules and statutes,  
5 moves this Court to join in the Motion for Discovery filed by LOPEZ.

6 This joinder to the Motion for Discovery is based upon the instant motion, notice of  
7 motion, the memorandum of points and authorities in support thereof filed on behalf of the co-  
8 defendant, the files and records in the above-entitled case, and any and all other materials which  
9 may be brought to the Court's attention prior to or at the time of the hearing on this motion.

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11 **MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS**

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13 Defense counsel had recently been retained in this matter and request permission to  
14 file further motions based upon case developments and additional discovery

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16 **CONCLUSION**

17 Based on the above, it is respectfully requested that the instant Motion for Joinder and  
18 Leave to File Further Motions be granted.

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21 Dated: March 18, 2008

THE RAMIREZ LAW FIRM

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23 By: /s/ MANUEL L. RAMIREZ  
24 Manuel L. Ramirez, Esq.  
25 Attorneys for Defendant,  
26 ARMANDO REGALADO NARANJO  
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